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Attorneys for Defendant
RTZ ASSOCIATES, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

INTUSCARE INC.,

Plaintiff,

v.

RTZ ASSOCIATES, INC.; and DOES 1
through 10,

Defendants.

Case No. 4:24-cv-1132-JST

Assigned to: Hon. Jon S. Tigar

**JOINT STIPULATION TO CONTINUE
DISCOVERY DEADLINES;
[PROPOSED] ORDER THEREON**

Complaint Filed: February 23, 2024
Amended Complaint Filed: April 2, 2024
Counterclaims Filed: June 20, 2024

Plaintiff IntusCare, Inc. (“Intus” or “Plaintiff”) and Defendant RTZ Associates, Inc. (“RTZ” or “Defendant”), by and through their respective counsel, enter into the following stipulation:

WHEREAS, on February 23, 2024, Intus filed its Complaint against RTZ;

WHEREAS, on April 2, 2024, Intus filed its Amended Complaint against RTZ;

WHEREAS, on June 20, 2024, RTZ filed its Counterclaims against Intus;

WHEREAS, on June 14, 2024, the Court entered a scheduling order;

WHEREAS, a jury trial is currently scheduled to begin on January 12, 2026 at 8:00 a.m.

WHEREAS, discovery deadlines are set for the following dates:

1. Fact discovery cut-off: June 20, 2025
2. Expert disclosures: July 11, 2025
3. Expert rebuttal: August 1, 2025
4. Expert discovery cut-off: August 22, 2025

WHEREAS, the Parties have been diligent both in propounding and producing discovery in a timely manner, and the proposed dates do not prejudice either party to appear at trial on the noticed and scheduled dates.

NOW, THEREFORE, the parties stipulate and agree to continue the above discovery deadlines by 45 days, as follows:

1. Fact discovery cut-off: August 4, 2025
2. Expert disclosures: August 25, 2025
3. Expert rebuttal: September 15, 2025
4. Expert discovery cut-off: October 6, 2025

Dated: May 9, 2025

MANATT, PHELPS & PHILLIPS, LLP

By: /s/ Charles E. Weir

Charles E. Weir
Andrew Beshai

Attorneys for Plaintiff
INTUS CARE, INC.

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2 Dated: May 9, 2025

NOSSAMAN LLP

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4 By: /s/ Kasia Penn

David C. Lee
Kasia Penn

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6 *Attorneys for Defendant*
RTZ ASSOCIATES, INC.
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[PROPOSED] ORDER

The Court, having reviewed and considered the Parties' Joint Stipulation to Continue
Discovery Deadlines, hereby ORDERS THAT:

1. The fact discovery cut-off is continued to August 4, 2025.
2. The expert disclosure deadline is continued to August 25, 2025.
3. The expert rebuttal deadline is continued to September 15, 2025.
4. The expert discovery cut-off is continued to October 6, 2025.

IT IS SO ORDERED

Dated: May 9, 2025

Hon. Jon. S. Tigar
United States District Judge

PROOF OF SERVICE

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